

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 EASTERN DIVISION
4
5 ROOSEVELT PARKER,
6 Plaintiff,
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8 VERSUS CIVIL ACTION NO. 2:22-cv-45-HSO-BWR
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10 STATE FARM FIRE AND
11 CASUALTY COMPANY,
12 Defendant.

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20 VIDEOCONFERENCE DEPOSITION OF SCOTT BERBERICH

21
22 Taken via Zoom Videoconference Software, on
23 Tuesday, January 10, 2023, beginning at
24 1:00 p.m.
25

1 surfaces, and the photos to see what areas of
2 damage occurred in what rooms. But it's a
3 combination of using all those tools to come up
4 with a -- with an estimate of repair.

5 Q. And I'm not necessarily, at this point,
6 talking about what it takes to prepare the
7 estimate. I want to know what it took to prepare
8 your opinion that the estimate is a fair
9 representation of the repairs needed to repair the
10 damage caused by the storm on April 9th, 2021. So
11 I'm trying to understand what your process was in
12 arriving at your opinion that this is a fair
13 representation of that.

14 A. Well, I mean, okay, so the photos are
15 showing what kind of damages are there, but you
16 can't -- the photos, alone, don't -- cannot get
17 you a proper estimate without using the
18 measurements and they use DocuSketch to be able to
19 get those. DocuSketch is a very good quality tool
20 to be able to get that. But the photos, alone,
21 are not able to get that. It requires all of
22 them.

23 Q. Okay. So to formulate your opinion that
24 this Exhibit 7 is a fair representation of the
25 repairs needed to repair the damage caused by the